



United States
Department of
Agriculture

Food and
Nutrition
Service

Mountain
Plains
Region

1244 Speer Boulevard
Denver, CO 80204

Reply to
Attn. of:

SP 94-C-30

NOV 8 1993

Subject: Meals for Secondary Students Attending Colleges

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa, Kansas, Missouri ED,
(Special Nutrition Programs) Montana OPI, Nebraska ED, North Dakota,
South Dakota, Utah, Wyoming ED

This memorandum gives guidance regarding the service of lunches under the National School Lunch Program (NSLP) or breakfasts under the School Breakfast Program (SBP) to high school students who attend college under special study programs and who gain both high school and college credit. Specifically this guidance deals with the school food authority (SFA) responsibility to provide meals to these students and how reimbursable meals could be provided.

We believe that this issue may be addressed through policy which is stated in FNS Instruction 786-8 REV. 1 (6-6-88) Reimbursement for Off-Site Meal Consumption. The Instruction refers to "work-study" students, but the arrangements described would be equally suitable for students as referred to above. Therefore, take out school breakfasts and/or lunches may be served to these students by their appropriate (home-base) SFAs and claimed for reimbursement. The provision of such lunches, however, would be at the option of the participating SFAs since we have consistently maintained that SFAs are only required to make Program meals available to eligible students who must be present at school during the meal service.

Colleges and universities participating in special study programs are not eligible to participate in the NSLP or SBP since they do not meet the definition of "school" under program regulations. Furthermore, we do not believe that the food service operations of these institutions could function as food service management companies under contract with SFAs for Program meal purposes since they would not be operating in "schools" and would probably not be able to comply with other NSLP and SBP regulatory requirements such as those dealing with competitive foods.

If you have any questions, please contact our office.

Ann C. Hector

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Regional Director
Special Nutrition Programs